

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

GRISSELLE RAMOS, on behalf of herself and	)	
all others similarly situated,	)	
	)	No. 08 CV 2703
Plaintiff,	)	
	)	Judge Lefkow
v.	)	
	)	Magistrate Judge Schenkier
PLAYTEX PRODUCTS, INC., RC2	)	
CORPORATION, LEARNING CURVE	)	
BRANDS, INC., and MEDELA, INC.,	)	
	)	
Defendants.	)	

**DEFENDANTS RC2's AND LEARNING CURVE's MOTION  
FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

NOW COME Defendants RC2 CORPORATION ("RC2") and LEARNING CURVE BRANDS, INC. ("Learning Curve"), ("Defendants") by their attorneys Ice Miller LLP and pursuant to FRCP 6(b) hereby requests the Court to extend the time for them to file their responsive pleading to July 2, 2008. In support of this motion, Defendants state as follows:

1. This action was filed on May 9, 2008 and Defendants RC2 and Learning Curve were served on May 13, 2008. Therefore their responsive pleading is due on June 2, 2008. The complaint also names 2 other unrelated defendants, Playtex Products, Inc. and Medela, Inc. According to the docket, Playtex was apparently served on May 14, 2008 and Medela has yet to be served.

2. Plaintiff's counsel has also filed the same complaint brought on behalf of three other plaintiffs in a case filed on May 15, 2008, *Scalia, et al. v. Playtex Products, Inc., RC2 Corporation, Learning Curve Brands, Inc. and Medela, Inc.*, No. 08 CV 2828, which is pending before Judge Nordberg.

3. Defense counsel is investigating the claims asserted and is in the process of developing a responsive pleading and strategy for responding to this and the related *Scalia* case. Defense counsel seeks an additional 30 days to complete its investigation and to formulate its responsive pleading.

4. Defense counsel attempted to contact Plaintiff's counsel on May 28, 2008 to discuss this matter but Plaintiff's counsel was unavailable so defense counsel was unable to obtain an agreement to this extension and cannot state what Plaintiff's position is with respect to this extension.

WHEREFORE, Defendants RC2 and Learning Curve request that the Court grant them an extension of time to July 2, 2008 to file their responsive pleading.

Respectfully submitted.

RC2 CORPORATION  
LEARNING CURVE BRANDS, INC.

s/Bart T. Murphy  
By one of their attorneys

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**CERTIFICATE OF SERVICE**

The undersigned an attorney, states that on May 29, 2008 he caused the foregoing to be filed with the Clerk of the United States District Court for the Northern District of Illinois and a copy of which will be served on the counsel listed below by the Clerk's ECF/CM system:

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s/Bart T. Murphy\_\_\_\_\_

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